



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

FILE

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OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

VIA CERTIFIED MAIL - P404-637-201

Mr. Richard Cole
Ball Corporation
345 South High Street
Muncie, Indiana 47305-2326

October 3, 1991

Re: Closure of Container Storage Areas
Ball Corporation
Muncie, Indiana
IND 00810713

Dear Mr. Cole:

The Indiana Department of Environmental Management (IDEM) has received your certifications dated May 9, 1991 and May 31, 1991, for buildings 48 & 56, that total closure has been completed as outlined in the approved closure plans for Ball Corporation. With the receipt of these certifications, total closure is completed as required by 329 IAC 3-21.

Ball Corporation originally notified the U.S. EPA, Region V, as a hazardous waste storage facility with the following hazardous waste activities: container storage. The closure certifications indicate that the following waste activity has been eliminated: container storage. With the completion of closure, the facility status is now classified as generator.

This is also to notify you that your facility is no longer required by 329 IAC 3-22-4 to maintain financial assurance for the closure of the hazardous waste management unit(s).

If you have any questions about this letter, please contact Mr. Mitch Mosier at AC 317/232-4534.

Sincerely,

Timothy J. Method
Assistant Commissioner
Solid and Hazardous Waste Management

MJM/go

cc: Delaware County Health Department
Ms. Fayola Wright, U.S. EPA, Region V
Mr. Hak Cho, U.S. EPA, Region V



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
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Muncie, Indiana 47305-2326

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

Mr. Richard H. Cole, Jr.
Ball Corporation
P.O. Box 2407
Muncie, Indiana 47307-0407

March 11, 1991

Re: Closure Plan
Building 48
Ball Corporation
Muncie, Indiana
IND 000810713

Dear Mr. Cole:

The Indiana Department of Environmental Management (IDEM) has reviewed your soil sampling & analysis results dated December 17, 1990, for Building 48.

Soil sampling results are adequate and indicate that soil excavation or remediation will not be necessary. Ball Corporation may proceed with pad decontamination of Building 48, as directed by the approved closure plan. Please submit the results of the decontamination rinsate along with the QA/QC data. Once the results are reviewed by the agency, a decision concerning closure certification will be rendered.

This letter also addresses your correspondence dated January 31, 1991, concerning an extension to complete closure. The IDEM recognizes that the length of time required for Agency review of the sampling & analysis results delayed Ball Corporation from completing closure on schedule. The IDEM hereby grants an extension of sixty (60) days to complete closure.

If you have any questions regarding this matter, please contact Mr. Mitch Mosier, at AC 317/232-4534.

Very truly yours,

Victor P. Windle

Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

MJM/go

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V.
Mr. Dennis Zawodni
Mr. James Hunt
Mr. Steve Buckel

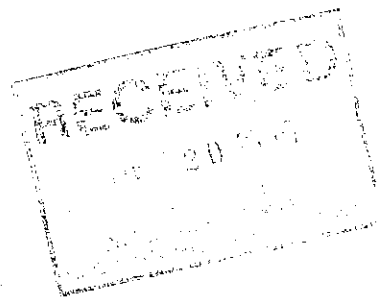
An Equal Opportunity Employer



Ball Corporation

345 South High Street, Muncie, Indiana 47305-2326 (317) 747-6100
Reply to: P.O. Box 2407, Muncie, Indiana 47307-0407

File 1C1C
building
48



December 17, 1990

Mr. Victor Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management
Indiana Department of Environmental Management
105 South Meridian Street
PO Box 6015
Indianapolis, IN 46206-6015

Dear Mr. Windle,

With respect to Ball Corporation's Treatment Storage and Disposal facility (IND000810713) known as Building 48, attached are a copy of the results obtained from the sampling and analysis conducted as required by our approved closure plan. This work was conducted under contract by MAECORP, Inc. A certification of the work they performed is included in the document.

Also attached is our evaluation of these data, and the conclusions that we have reached. A certification by Ball as owner/operator is attached.

Sincerely,

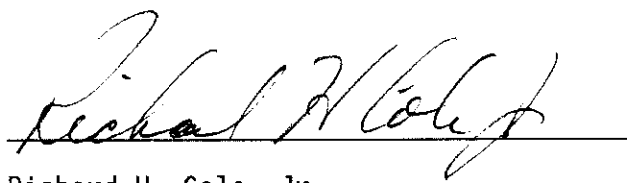
Richard H. Cole, Jr.
Senior Chemical Information Analyst

rhc

attachment

I certify that, to the best of my knowledge, the sampling conducted by MAECORP, Inc. as prescribed by the approved Closure Plan for the portion of Ball Corporation's Treatment, Storage and Disposal facility known as Building 48 was conducted in accordance with said Closure Plan.

I further certify that the information contained in the document titled "EVALUATION OF THE RESULTS OBTAINED FROM THE SUB-SURFACE SAMPLING CONDUCTED FOR THE PORTION OF BALL CORPORATION'S TREATMENT STORAGE AND DISPOSAL FACILITY (IND000810713) KNOWN AS BUILDING 48" dated December 13, 1990, is, to the best of my knowledge, accurate and correct.

A handwritten signature in cursive script, reading "Richard H. Cole, Jr.", written over a horizontal line.

Richard H. Cole, Jr.

A handwritten date "17 Dec 90" written in cursive script, underlined.

EVALUATION OF THE RESULTS OBTAINED FROM
THE SUB-SURFACE SAMPLING CONDUCTED
FOR THE PORTION OF BALL CORPORATION'S
TREATMENT STORAGE AND DISPOSAL FACILITY
(IND000810713)
KNOWN AS BUILDING 48

December 13, 1990

I. Introduction

As specified by the IDEM-approved closure plan for Building 48, samples were taken of the soil beneath and around the building at specified sites. The samples were analyzed in accordance with the criteria set forth in the plan. Re-analysis and additional analysis were conducted when mandated by the applicable provisions of the plan.

This work was performed by MAECORP, Inc., and their sub-contractors, under their project designation #IN-A207. They have certified that the work was performed as specified. The results were transmitted to Ball Corporation in an Interim Report dated September 11, 1990.

The data were evaluated to determine if any contamination was found to exist, and to determine the need for additional sampling to accurately define any extent of contamination per Section 3.2 of the plan.

II. Criteria

As specified by the closure plan, any sample yielding an analytical result that exceeded the established criterion for contamination would be re-analyzed to confirm the validity of the finding. Two analytical results exceeding the criterion for contamination are required for a sample to be designated as being positive.

As specified by the plan, analyses were performed on samples taken from the top two feet of soil. The borings taken inside the building are identified as IB1 to IB7, those taken outside are OB1 to OB3. In instances where positive results were found at the lowest analyzed level, samples from three, four and five feet levels were analyzed for the contaminant in question.

III. Overview of Results

The individual analyses are contained in MAECORP's Interim Report, which is attached, and consists of three individual binders.

The analyses were negative at all levels at all sample locations for arsenic, chromium, mercury, selenium, silver, all volatile organic compounds, most semi-volatile organic compounds, and corrosivity.

Results defined by the closure plan as meeting the criteria for contamination were found at some levels and some locations for barium, cadmium, some semi-volatile organic compounds, and pH.

IV. Analysis and Discussion of Specific Findings

Please note that the data in this section differ from those presented by MAECORP in Table 2 'Summary of Sample Status' of their report. MAECORP's data are the results of just the re-analysis. The following data are averages of the two analyses, which are considered to be more appropriate.

A. Barium

Positive results were recorded at the 18-24 inch level at locations IB1 and IB2, and for the duplicate sample taken at the 0-6 inch level of IB1. These findings will be evaluated separately.

1. 18-24 Inch level samples.

The criterion for contamination at the 18-24 inch level was 123 ppm. Two samples, IB1 and IB2, produced results of 149 and 156.5, respectively. While these results appear to be above the background levels, examination of the data reveals that these positive results are artifacts of the sampling process, and not true indications of contamination.

The background samples for the 18-24 inch level happened to produce uniform values, with little deviation, thus producing a very low standard deviation. This can be shown by comparison with the other levels:

<u>level</u>	<u>average</u>	<u>standard deviation</u>	<u>criteria for contamination</u>
0-6	126	38.5	242
6-12	118	27.3	200
12-18	96.2	20.7	158
18-24	96.4	8.91	123
30-36	62.7	32.9	161
42-48	37.7	29.6	127
54-60	50.1	61.9	236

The 18-24 inch level has a much smaller standard deviation (and resulting criterion for contamination) than would be expected from comparison with the surrounding levels. For example, the level immediately above (12-18 inch) has almost the identical average, but its standard deviation is more than double. If the positive results from the 18-24 inch level would have been obtained at any of the other higher soil levels, the results would have been negative.

2. Duplicate sample at IB1

The 0-6 inch IB1 duplicate sample produced results that exceeded the criterion for contamination, while the 'original' sample did not. The first analysis show both samples above the criterion for contamination, but upon re-analysis, the original sample dropped below the criterion, while the duplicate did not.

The actual data, in ppm, are:

	<u>first analysis</u>	<u>re-analysis</u>	<u>average</u>
IB1 original sample	299	217	258
IB1 duplicate sample	248	257	252
Criterion for contamination			242

Duplicate samples are taken to confirm the validity of the sampling procedure and the sample handling protocol. The duplicate were generated in the field by splitting the soil sample for the particular level of a boring. The sample was mixed, but not homogenized before splitting.

The contractor who conducted the sampling and analysis does not consider this finding to cast any doubt upon the validity of the sampling and/or analysis. By examining the data, it can be seen that average for the 'contaminated' sample was actually lower than the average of the clean sample. Thus the duplicate sample did not actually deviate significantly from the original sample. The seemingly contradictory results are an artifact of the criteria for contamination.

B. Cadmium

The positive results, in ppm, for cadmium are displayed below by location and level, along with the respective background average and the three standard deviation criterion for contamination:

<u>Level</u>	<u>Ave</u>	<u>+3SD</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	1.22	2.20	-	-	-	-	-	-	-	-	-	-
6-12	1.35	3.18	-	-	-	6.12	*	-	-	-	-	-
12-18	1.00	1.00	2.43	2.49	-	5.11	-	-	-	-	-	1.19
18-24	1.03	1.15	1.83	1.59	-	1.62	-	-	-	-	-	1.23
30-36	1.05	1.33	-	-	-	-	*	*	*	*	*	-
42-48	1.03	1.19	-	-	-	-	*	*	*	*	*	-
54-60	1.00	1.00	-	-	-	-	*	*	*	*	*	-

- = negative results, * = not conducted, SD = standard deviation

Significant points about the results are that no positives were obtained at levels lower than two feet, and that the positive results in OB3 are only marginally above the criterion.

C. Semi-Volatile Organic Compounds

A total of 11 different semi-volatile organic compounds (SVOCs) gave results above the criteria for contamination at various levels at four locations:

1. Naphthalene, in ppm

<u>Level</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	-	-	-	-	-	-	-	-	-	-
6-12	-	-	-	-	*	-	-	-	-	-
12-18	-	-	-	-	-	-	-	-	-	-
18-24	-	-	-	-	0.16	-	-	-	-	-
30-36	*	-	*	*	-	*	*	*	*	*
42-48	*	-	*	*	0.15	*	*	*	*	*
54-60	*	-	*	*	-	*	*	*	*	*

- = negative results, * = not conducted

2. Benzo(ghi)perylene, in ppm

<u>Level</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	-	-	-	-	-	-	-	-	-	-
6-12	-	-	-	-	*	-	0.25	-	-	-
12-18	-	-	-	-	0.29	-	-	-	-	-
18-24	-	-	-	-	0.31	-	-	-	-	-
30-36	*	-	*	*	0.16	*	*	*	*	*
42-48	*	-	*	*	0.43	*	*	*	*	*
54-60	*	-	*	*	-	*	*	*	*	*

- = negative results, * = not conducted

3. Anthracene, in ppm

<u>Level</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	-	-	-	-	-	-	-	-	-	-
6-12	-	-	-	-	*	-	-	-	-	-
12-18	-	-	-	-	0.16	-	-	-	-	-
18-24	-	-	-	-	-	-	-	-	-	-
30-36	*	-	*	*	-	*	*	*	*	*
42-48	*	-	*	*	-	*	*	*	*	*
54-60	*	-	*	*	-	*	*	*	*	*

- = negative results, * = not conducted

4. Phenanthrene, in ppm

<u>Level</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	-	0.24	-	-	-	0.21	-	-	-	-
6-12	-	-	-	-	*	-	0.73	-	-	-
12-18	-	-	-	-	0.72	-	-	-	-	-
18-24	-	0.93	-	-	0.45	-	-	-	-	-
30-36	*	-	*	*	0.20	*	*	*	*	*
42-48	*	-	*	*	0.41	*	*	*	*	*
54-60	*	-	*	*	-	*	*	*	*	*

- = negative results, * = not conducted

5. Benzo(a)pyrene, in ppm

<u>Level</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	-	-	-	-	-	0.18	-	-	-	-
6-12	-	-	-	-	*	-	0.43	-	-	-
12-18	-	-	-	-	0.40	-	-	-	-	-
18-24	-	0.58	-	-	0.43	-	-	-	-	-
30-36	*	-	*	*	0.15	*	*	*	*	*
42-48	*	-	*	*	0.44	*	*	*	*	*
54-60	*	-	*	*	-	*	*	*	*	*

- = negative results, * = not conducted

6. Benzo(k)fluoranthene, in ppm

<u>Level</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	-	-	-	-	-	-	-	-	-	-
6-12	-	-	-	-	*	0.28	-	-	-	-
12-18	-	-	-	-	0.85	-	-	-	-	-
18-24	-	1.11	-	-	-	-	-	-	-	-
30-36	*	-	*	*	0.34	*	*	*	*	*
42-48	*	-	*	*	0.92	*	*	*	*	*
54-60	*	-	*	*	-	*	*	*	*	*

- = negative results, * = not conducted

7. Chrysene, in ppm

<u>Level</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	-	0.15	-	-	-	0.19	-	-	-	-
6-12	-	-	-	-	*	-	-	-	-	-
12-18	-	-	-	-	0.44	-	-	-	-	-
18-24	-	0.50	-	-	0.42	-	-	-	-	-
30-36	*	-	*	*	0.24	*	*	*	*	*
42-48	*	-	*	*	0.46	*	*	*	*	*
54-60	*	-	*	*	-	*	*	*	*	*

- = negative results, * = not conducted

8. Benzo(b)fluoranthene, in ppm

<u>Level</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	-	0.18	-	-	-	-	-	-	-	-
6-12	-	-	-	-	*	0.28	-	-	-	-
12-18	-	-	-	-	0.51	-	-	-	-	-
18-24	-	-	-	-	-	-	-	-	-	-
30-36	*	-	*	*	0.33	*	*	*	*	*
42-48	*	-	*	*	-	*	*	*	*	*
54-60	*	-	*	*	-	*	*	*	*	*

- = negative results, * = not conducted

9. Fluoranthene, in ppm

<u>Level</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	-	0.39	-	-	1.05	0.52	-	-	-	-
6-12	-	-	-	-	*	0.48	1.16	-	-	-
12-18	-	-	-	-	1.28	-	-	-	-	-
18-24	-	1.97	-	-	0.96	-	-	-	-	-
30-36	*	-	*	*	0.42	*	*	*	*	*
42-48	*	-	*	*	0.84	*	*	*	*	*
54-60	*	-	*	*	-	*	*	*	*	*

- = negative results, * = not conducted

10. Benzo(a)anthracene, in ppm

<u>Level</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	-	0.16	-	-	-	-	-	-	-	-
6-12	-	-	-	-	*	-	0.50	-	-	-
12-18	-	-	-	-	0.35	-	-	-	-	-
18-24	-	0.39	-	-	-	-	-	-	-	-
30-36	*	-	*	*	0.24	*	*	*	*	*
42-48	*	-	*	*	0.47	*	*	*	*	*
54-60	*	-	*	*	-	*	*	*	*	*

- = negative results, * = not conducted

11. Pyrene, in ppm

<u>Level</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	-	0.42	-	-	-	0.35	-	-	-	-
6-12	-	-	-	-	*	0.34	1.12	-	-	-
12-18	-	-	-	-	0.91	-	-	-	-	-
18-24	-	1.13	-	-	0.70	-	-	-	-	-
30-36	*	-	*	*	0.34	*	*	*	*	*
42-48	*	-	*	*	0.64	*	*	*	*	*
54-60	*	-	*	*	-	*	*	*	*	*

- = negative results, * = not conducted

Reviewing these data, the following points become apparent:

1. No positive results were obtained outside the building.
2. No positive results were obtained at the lowest level analyzed at any location.
3. No result was obtained over 2 ppm, and most were below 1 ppm.

Additionally, there does not appear to be any pattern of contamination. The four borings that had positive results are not all adjacent. The borings that were adjacent did not always have positive results at the same levels. Within the same location, a specific contaminant will appear at separated levels.

D. pH

The results obtained for pH that are positive according to the criteria for contamination are listed below. This information was generated despite concerns that applying standard deviation to logarithmic numbers might be meaningless.

<u>Level</u>	<u>Ave</u>	<u>3SD</u>	<u>IB1</u>	<u>IB2</u>	<u>IB3</u>	<u>IB4</u>	<u>IB5</u>	<u>IB6</u>	<u>IB7</u>	<u>OB1</u>	<u>OB2</u>	<u>OB3</u>
0-6	7.03	7.35	-	-	-	7.4	7.4	7.5	-	-	-	-
6-12	6.73	7.17	-	-	7.4	7.3	*	9.1	-	-	7.3	8.5
12-18	6.85	7.30	-	-	-	7.4	-	9.2	-	-	-	-
18-24	6.83	7.15	-	-	-	-	7.3	7.7	7.2	-	7.2	-

- = negative results, * = not conducted, SD = standard deviation

While positive results were obtained, reviewing this data does not indicate that any contamination has occurred. All values are within range of pH values that are considered to be neutral.

V. Conclusions

The positive results obtained for barium and pH are not considered to be valid indications that any contamination has occurred, for the reasons so stated above. No additional actions are considered to be necessary.

The positive results for cadmium and the specific SVOCs, in our opinion, are not a result of any operation that was conducted within the Building when it was a waste storage facility, and are not sufficiently high to warrant any remediation. The industrial site on which Building 48 is located has been used for heavy industrial manufacturing for 103 years. A certain amount of low level oil and metal deposition into the soil would be expected to have occurred over this time period. The levels are low, and do not show any pattern that would indicate contamination from a spill or leak.

FILE

N. Cho



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

VIA CERTIFIED MAIL - P124-433-945

2572

November 26, 1990

Mr. Richard H. Cole, Jr.
Chemical Information Analyst
Ball Corporation
P.O. Box 2407
Muncie, Indiana 47307-0407

Re: Modification to Approved Closure Plan
Ball Corporation Building 56
Muncie, Indiana
IND 000810713

Dear Mr. Cole:

The modifications to the approved closure plan dated February 21, 1990, for container storage have been approved.

A public notice of the closure plan was published in the Muncie Star. The public comment period began on the date of publication, September 3, 1990, and ended on October 3, 1990. No comments were received.

Applicable closure activities must be completed in accordance with the approved plan within one-hundred eighty (180) days after the date of this approval letter. When closure is completed, the owner or operator must submit to the Commissioner certification in accordance with 329 IAC 3-34-2(d) and 329 IAC 3-21-6, both by the owner or operator and by an independent registered professional engineer, that the facility has been closed in accordance with the specifications in the approved closure plan. The response must indicate the facility's desired future status. Mail your response and certification to:

Mr. Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management
Department of Environmental Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015

In addition, Section 206 of the Hazardous and Solid Waste Amendments of 1984 (HSWA) requires that corrective actions be performed for all releases of hazardous waste or constituents from any solid waste management unit. The U.S. Environmental Protection Agency (U.S. EPA) has the authority to implement this provision, therefore, your company may still be subject to HSWA requirements.

If you wish to challenge this decision, IC 13-7-10-2.5 and IC 4-21.5-3-7 require that you file a Petition for Administrative Review. If you seek to have the effectiveness of the closure plan stayed during administrative review, you must also file a Petition for Stay. The petition(s) must be submitted to the Technical Secretary of the Solid Waste Management Board at the below address within fifteen (15) days after your receipt of this notice. The petition(s) must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision, or otherwise entitled to review by law. Additionally, IC 13-7-10-2.5 requires that a petition for administrative review must include:

1. The name and address of the person making the request.
2. The interest of the person making the request.
3. Identification of any persons represented by the person making the request.
4. The reasons, with particularity, for the request.
5. The issues, with particularity, proposed for consideration at the hearing.
6. Identification of the terms of the closure plan which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing licenses of the type granted or denied by the Commissioner.

Pursuant to IC 4-21.5-3-1(f), any document serving as a petition for review or review and stay must be filed with Ms. Kathy Prosser, Technical Secretary of the Solid Waste Management Board. Filing of such a document is complete on the earliest of the following dates:

1. the date on which the petition is delivered to the Office of the Technical Secretary of the Solid Waste Management Board, located at 105 South Meridian Street, P. O. Box 6167, Indianapolis, Indiana 46206-6167;
2. the date of the postmark on the envelope containing the petition, if the petition is mailed by United States mail; or
3. the date on which the petition is deposited with a private carrier, as shown by a receipt issued by the carrier, if the petition is sent by private carrier.

Richard Cole
Page 3

Please direct all questions regarding the closure process to John P. Maher
of my office at AC 317/232-3398.

Sincerely,

A handwritten signature in dark ink, appearing to read "H. Martin Harmless II", written over the typed name.

H. Martin Harmless II
Assistant Commissioner for
Solid and Hazardous Waste Management

JPM/go

Enclosures

cc: Mr. Hak Cho, U.S. EPA, Region V (with enclosure)
Ms. Fayola Wright, U.S. EPA, Region V
Delaware County Health Department (with enclosure)
Mr. Jeff Stevens
Mr. James Hunt (with enclosure)
Mr. Dennis Zawodni (with enclosure)

FILE



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

RECEIVED
AUG 27 1990
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

August 24, 1990

Mr. Richard H. Cole, Jr.
Chemical Information Analyst
Ball Corporation
P.O. Box 2407
Muncie, Indiana 47307-0407

Re: Closure Extension
Ball Corporation Building 48
Muncie, Indiana
IND 000810713

Dear Mr. Cole:

The Indiana Department of Environmental Management (IDEM) has received your June 13, 1990, request for an extension to complete closure activities at Building 48. The request has been reviewed and approved.

Ball Corporation requested the extension to adequately review and complete the analytical data that was generated during the first stage of closure. All closure activities must be completed by December 28, 1990. Certification of closure is due within sixty (60) days of closure completion.

If you have any questions concerning this matter, please contact John P. Maher of the Plan Review and Permit Section at AC 317/232-3398.

Sincerely,

Victor P. Windle

Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

JPM/go

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V
Delaware County Health Department



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

FILE

105 South Meridian Street

P.O. Box 6015

Indianapolis 46206-6015

Telephone 317-232-8603

August 9, 1990

Legal Advertising Department
Muncie Star
P.O. Box 2408
128 S. High Street
Muncie, Indiana 47302

Re: Public Notice of Modifications
to Approved Closure Plan
Ball Corporation Building No. 56
IND 000810713

Dear Sir/Madam:

Enclosed is a copy of our public notice of modification of the approved closure plan for Ball Corporation, Building No. 56, Muncie, Indiana. Please publish this notice, one time, on Monday, September 3, 1990.

Please provide a notarized form and clippings showing the date of publication. All charges should be billed to the Department of Environmental Management, Office of Solid and Hazardous Waste Management. If a separate invoice is sent, be sure to include the publication date of the notice on the invoice.

Your timely attention to this matter is appreciated.

Sincerely,

Victor P. Windle

Victor P. Windle
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste
Management

JPM/bcm

Enclosure

cc: ✓ Mr. Hak Cho, U.S. EPA, Region V (with enclosure)
Ms. Fayola Wright, U.S. EPA, Region V (with enclosure)
Mr. Lorenzo Parks, IDEM (with enclosure)

PUBLIC NOTICE

The Commissioner of the Indiana Department of Environmental Management has received modifications to an approved closure plan from Ball Corporation, Building No. 56, 1509 South Macedonia Avenue, Muncie, Indiana, U.S. EPA ID No. IND 000810713. The company originally notified the U.S. Environmental Protection Agency as a storage facility of hazardous waste with the following hazardous waste activity: container storage. The plan proposes the elimination of the following hazardous waste activity: container storage.

Pursuant to 329 IAC 3-21, the Commissioner is providing the owner or operator and the public an opportunity to submit written comment on the plan and request modifications of the plan within thirty (30) days of the date of this notice.

Corrective action response letters have been sent to the facility to elicit information to ensure that there have been no uncorrected releases concerning hazardous wastes or hazardous waste constituents to the environment from any existing or former solid waste management units. This is to fulfill the U.S. EPA's obligation under the Hazardous and Solid Waste Amendments of 1984.

The Commissioner can also, in response to a request, hold a public hearing whenever such a hearing might clarify one or more issues concerning the plan or issues involving releases of hazardous waste or hazardous waste constituents from the facility. The Commissioner will give public notice of the hearing at least thirty (30) days before it occurs.

The plan and related background documents are available to the public for inspection and copying at the Indiana Department of Environmental Management, Office of Solid and Hazardous Waste Management, 105 South Meridian Street, Room 901, Indianapolis, Indiana, from 8:15 a.m. to 4:30 p.m., Monday through Friday. The plan is also available at the Muncie Public Library, 301 West Jackson Street, Muncie, Indiana 47305 and the Delaware County Health Department, Delaware County Building, Room 207, 1000 West Main Street, Muncie, Indiana 47305.

Persons wishing to comment on the plan should submit such comments in writing to:

Mr. Thomas E. Linson, Chief
Hazardous Waste Management Branch
Office of Solid and Hazardous Waste Management
Indiana Department of Environmental Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015

For additional information, contact Mr. John Maher at AC 317/232-3398.

JPM/bcm



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

FILE

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

RECEIVED

FEB 2 - 1990

January 31, 1990

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

VIA CERTIFIED MAIL - P730-169-958
Mr. Richard H. Cole, Jr.
Ball Corporation
P.O. Box 2407
Muncie, Indiana 47307-0407

Re: Clarifications of Modified Closure Plan
Ball Corporation, Building 48
Muncie, Indiana
IND 000810713

Dear Mr. Cole:

This letter is to correct typographical errors and clarify the intent of the December 28, 1989, closure plan modifications for Building 48. These clarifications are based on a January 16, 1990, telephone conversation between yourself and Mr. John Maher of the Indiana Department of Environmental Management (IDEM).

The second paragraph of the modifications states that a QAPP shall be submitted to the IDEM for approval within sixty (60) days of the date of closure plan approval and at least forty-five (45) days prior to sampling. If the QAPP is submitted within those time frames, the IDEM will review it within forty-five (45) days of receipt. Ball Corporation may begin sampling before the forty-five (45) days has passed, as long as the QAPP has been approved.

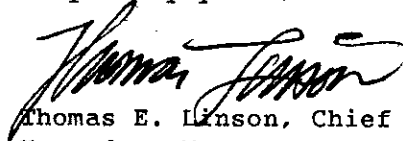
The first sentence under Section 2.2 states, "The wash procedure described in Section 2.2 ...". The sentence should read "The wash procedure described in Section 2.1 ...".

The third paragraph under Section 3.6 states "Any background sample ... will be re-analyzed ..." and "sample will be thrown out ...". "Will be" in both sentences shall read "may be".

Mr. Richard H. Cole, Jr.
Page 2

If you have any questions concerning this matter, please contact
Mr. John P. Maher of the Plan Review and Permit Section at AC 317/232-4534.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Thomas E. Linson", written in a cursive style.

Thomas E. Linson, Chief
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

JPM/sc

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V
Delaware County Health Department
Mr. Steve Buckel
Mr. Thomas Greenawalt
Mr. James Hunt
Mr. Dennis Zawodni



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

FILE

RECEIVED
JAN 2 - 1990
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION 17

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

VIA CERTIFIED MAIL - P730-169-940

December 28, 1989

Mr. Richard H. Cole, Jr.
Ball Corporation
P.O. Box 2407
Muncie, Indiana 47307-0407

Re: Modified Closure Plan
Ball Corporation, Building 48
Muncie, Indiana
IND 000810713

Dear Mr. Cole:

The total closure plan dated October 20, 1988, as revised on December 27, 1988, and October 23, 1989, for container storage in Building 48 has been approved with the attached modifications.

A public notice of the closure plan was published in the Muncie Star. The public comment period began on the date of publication, December 22, 1988, and ended on January 22, 1989. No comments were received.

Applicable closure activities must be completed in accordance with the approved plan within one hundred eighty (180) days after the date of this approval letter. When closure is completed, the owner or operator must submit to the Commissioner certification in accordance with 329 IAC 3-34-2(d) and 329 IAC 3-21-6. Certification shall be by both the owner or operator and by an independent, registered professional engineer, stating that the facility has been closed in accordance with the specifications in the approved closure plan. The response must indicate the facility's desired future status. Mail a copy of your response and certification to:

Mr. Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management
Department of Environmental Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015

In addition, Section 206 of the Hazardous and Solid Waste Amendments of 1984 (HSWA) require that corrective actions be performed for all releases of hazardous waste or constituents from any solid waste management unit. The U.S. Environmental Protection Agency (U.S. EPA) has the authority to implement this provision, therefore, your company may still be subject to HSWA requirements.

If you wish to challenge this decision, IC 13-7-10-2.5 and IC 4-21.5-3-7 require that you file a Petition for Administrative Review. If you seek to have the effectiveness of the closure plan stayed during administrative review, you must also file a Petition for Stay. The petition(s) must be submitted to the Commissioner at the above address within fifteen (15) days after your receipt of this notice. The petition(s) must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision, or otherwise entitled to review by law. Additionally, IC 13-7-10-2.5 requires that a Petition for Administrative review must include:

1. The name and address of the person making the request.
2. The interest of the person making the request.
3. Identification of any persons represented by the person making the request.
4. The reasons, with particularity, for the request.
5. The issues, with particularity, proposed for consideration at the hearing.
6. Identification of the terms of the closure plan which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing licenses of the type granted or denied by the Commissioner.

Pursuant to IC 4-21.5-3-1(f), any document serving as a petition for review, or review and stay must be filed with the Technical Secretary of the Solid Waste Management Board. Filing of such a document is complete on the earliest of the following dates:

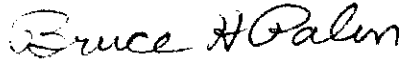
1. The date on which the petition is delivered to the Office of the Technical Secretary of the Solid Waste Management Board, located at 105 South Meridian Street, Fifth Floor, Indianapolis, Indiana 46206-6015.
2. The date of the postmark on the envelope containing the petition, if the petition is mailed by United States mail; or
3. The date on which the petition is deposited with a private carrier, as shown by a receipt issued by the carrier, if the petition is sent by private carrier.

Mr. Richard H. Cole, Jr.

Page 3

Please direct all questions regarding the closure process to Mr. John P. Maher of the Plan Review and Permit Section at AC 317/232-4534.

Sincerely,

A handwritten signature in cursive script that reads "Bruce H. Palin".

Bruce H. Palin
Acting Assistant Commissioner for
Solid and Hazardous Waste Management

JPM/ssh

Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region V (with enclosure)
Ms. Fayola Wright, U.S. EPA, Region V
Delaware County Health Department
Mr. Jeff Stevens
Ms. Catherine Lynch
Mr. Dennis Zawodni (with enclosure)
Mr. Jim Hunt (with enclosure)
Mr. Steve Buckel (with enclosure)
Mr. Thomas Greenwalt (with enclosure)

CLOSURE PLAN MODIFICATIONS
Ball Corporation Building 48
Muncie, Indiana
IND 000810713

This document addresses the inadequacies of Ball Corporation's October 20, 1989, Closure Plan and specifically modifies the referenced sections of said closure plan.

Ball Corporation will submit to the Indiana Department of Environmental Management (IDEM) for approval a Quality Assurance Project Plan (QAPP) from the laboratory retained to analyze closure samples. The QAPP shall be submitted within sixty (60) days of the date of the closure plan approval and at least forty five (45) days prior to any closure sampling events.

Section 2.2 Sampling and Analysis Plan - Interior

The washing procedure described in Section 2.2 will be performed only if the soil sampling results indicate no contamination beneath building #48. The washing(s) will be necessary only if building #48 is to be clean closed in place.

Section 2.2 neglects to address the possibility that contamination could still be present after the first washing. The following sentence will be incorporated as the first sentence of paragraph 2. "If the analytical results show values above the stated threshold values, then the decontamination procedure stated in Section 2.1 will be repeated until the final rinsate shows values below the stated threshold values."

Section 3.1 First Phase Soil Sampling

Section 3.1 neglects to specify the number of borings and also substitutes the word "samples" for "borings". The first sentence in paragraph 2 which states, "The exact location of the soil samples are shown on Figure 3.", is replaced with "The exact locations of the 10 soil borings are shown on Figure 3."

Figure 3. Sampling Locations Building #48

The commentary located at the top left corner of Figure 3 has been changed from, "Background boring location to be selected in field", to "Background boring locations to be selected in field". The 10 borings located in and around building #48 will be located at the boring locations denoted by an X on Figure 3, (attached).

Section 3.2 Second Phase Soil Sampling

If results indicate that contamination exists under and/or outside the building, additional soil sampling will be necessary to accurately define the horizontal and vertical extent of the contamination. The second sentence of Section 3.2 states that a determination will be made if additional soil sampling is needed. Excluding the first sentence of Section 3.2, the rest of the paragraph will read as follows, "If, however, the results indicate that contamination exists under and/or outside the building, additional soil

sampling will be necessary to accurately define the horizontal and vertical extent of contamination. Strategy for additional soil sampling will be made with IDEM approval. All additional sampling and analysis will be conducted as specified in sections 3.4 and 3.5 respectively."

Section 3.4 Soil Sampling Procedures and Analytical Strategy

The sampling procedures and analytical strategy outlined in Section 3.4 are ambiguous and lack sufficient detail to accurately determine if contamination exists under and/or around building #48. The proposed initial analysis of samples only to the 12" depth is inadequate. Stratification of contaminants could easily be missed using this strategy. Section 3.4 will be totally deleted and replaced with the following paragraphs.

"All soil borings will be performed using a modified California split-spoon sampler or similar sampling device that will collect an undisturbed sample. If the location is on concrete, the soil will be exposed by coring through the concrete. All soil borings will be classified using the USDA textural classification system. All soil samples will be visually inspected for evidence of contamination. Samples will be collected, for each of the 10 borings, at 6" intervals down to 2 feet and every foot thereafter - down to 5 feet. Samples will not be composited. Bore holes will be backfilled with a Bentonite and cement grout. The 40 samples collected from the 10 borings at the 6", 12", 18", & 24" depths will be analyzed immediately. If results indicate contamination, then the 30 samples collected from the 36", 48", & 60" depths will be analyzed. If contamination is discovered at these depths, further sampling and analysis will be necessary. Timeliness of analysis is critical due to the 14 day holding time for VOCs, and the 7 day before extraction (40 days until analysis) holding time for SVOCs.

The sampling equipment used to collect the soil samples will be decontaminated with a non-phosphate detergent while scrubbing with a stiff brush until all visible traces of soil are removed, followed by an organic solvent rinse, and triple rinsing with distilled water until no visible traces of detergent remain.

Chain-of-custody documentation shall be maintained, with the appropriate form being signed by the sampler upon collection and by subsequent personnel until the sample is received by the laboratory.

One duplicate sample will be collected for every ten (10) field samples. The duplicate samples will be analyzed for the same parameters as the field samples.

Should contamination be discovered in any sample taken at the 5 foot level, sampling will be conducted from the same borings at 1 foot intervals down to the first aquifer. All samples will be analyzed for the same constituents as analyzed in phase one. Contamination at the lower depths will trigger the initiation of third phase ground water monitoring, Section 3.3.

Section 3.5 Laboratory Test Methods for Soil Samples

Background samples need not be analyzed for SVOCs. The "clean" levels for VOCs and SVOCs will be defined as levels at or below the detection limits for each compound. The second sentence which reads, "Background samples will be analyzed for RCRA heavy metals, SVOCs, corrosivity and pH only.", will read, "Background samples will be analyzed for RCRA heavy metals, corrosivity, and pH only.".

Section 3.6 Background Samples

A single background boring cannot adequately define clean-up levels. The depths of the proposed 20 background samples are not defined. The elimination of results falling outside two standard deviations could distort the actual background concentrations of the constituents of interest. The second and third paragraphs of Section 3.6 shall be deleted and replaced by the following two paragraphs.

"At least four background borings will be made with samples taken every 6" down to 2 feet and every foot thereafter down to 5 feet. The mean and standard deviation will be calculated for each set of the 4 samples taken from each depth, for each parameter of concern. In the event that further sampling and analysis is required beyond the 5 foot depth, background samples will be procured from the same borings at the same 1 foot intervals as the sample borings. To reduce the possibility of a localized variation in the background soil having a significant impact on the background samples, the initial 28 background samples and duplicates, from the 4 borings, will be taken from areas that reasonably can be assumed to be unaffected by hazardous waste operations and are not known by Ball Corp. to be fill material.

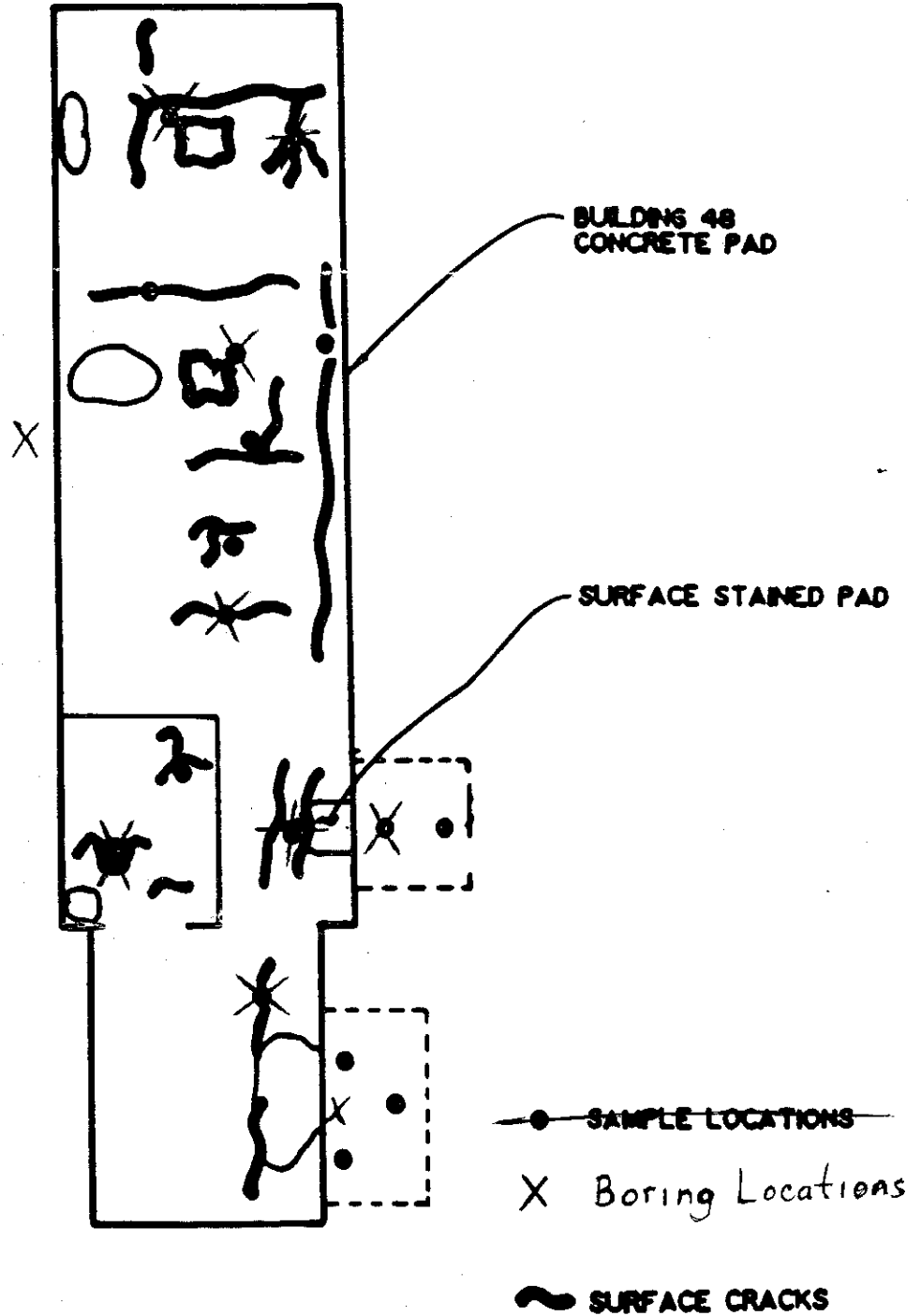
Any background sample yielding results above two standard deviations from the arithmetic mean will be re-analyzed for the specific parameter in question. If the second analysis confirms the original finding, then that sample will be thrown out as not being typical of background soil, and will not be used in calculating any background mean or standard deviation. For metals yielding a zero reading, its detection limit will be used in the calculation of the mean and standard deviation."

Section 3.7 Determination of Contamination Criteria for Soil Samples

For VOC and SVOCs, the criteria for contamination shall be the analytical detection limits. The second and third sentences of Section 3.7 which read, "For VOCs the criteria for contamination shall be the analytical detection limits. For RCRA heavy metals, SVOCs, and pH, the criteria for contamination shall be analytical results greater than three standard deviation units from the arithmetic mean of the background samples.", will read as follows, "For VOCs and SVOCs the criteria for contamination shall be the analytical detection limit for that compound. For RCRA heavy metals and pH, the criteria for contamination shall be analytical results greater than three standard deviation units from the arithmetic mean of the background samples."

Figure 3

● BACKGROUND BORING
LOCATION TO BE
SELECTED IN FIELD



Sampling Locations
Building 48

Scale 1" = 30'



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

FILE
RECEIVED
SEP 22 1989
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA REGION V

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

VIA CERTIFIED MAIL - P730-167-576

September 19, 1989

Mr. Richard H. Cole Jr.
Chemical Information Specialist
Ball Corporation
P.O. Box 2407
Muncie, Indiana 47307-0407

Re: Notice of Deficiency
Closure Plan, Building 48
Ball Corporation
Muncie, Indiana
IND 000810713

Dear Mr. Cole:

Your December 27, 1988, Closure Plan has been reviewed and found to be inadequate for approval. The enclosed "Closure Plan Deficiencies" identifies those areas which need to be addressed.

Please submit five (5) copies of the revised Closure Plan within thirty (30) days of the date of this letter.

If you have any questions regarding this matter please contact Mr. John P. Maher of my staff at AC 317/232-4534.

Very truly yours,

Linda L. Bobo, Acting Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

JPM/bja

Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V
Delaware County Health Department
ATEC Environmental Consultants
Mr. Dennis Zawodni, IDEM
Mr. James Hunt, IDEM

An Equal Opportunity Employer

Notice of Deficiency
Closure Plan Deficiencies
Ball Corporation, Building 48
IND 000810713

1. If contamination occurs in the zone of saturation, a narrative of the geology of the site must be included in the Closure Plan for the purpose of pollution assessment. The geology narrative should include a discussion of all available soil data, subsurface geology, aquifer depths, a well survey (to include logs and maps illustrating locations) of any public or private wells in the area and any other pertinent information that would be helpful in assessing the site.
2. The installation of any monitoring wells and soil borings shall adhere to the requirements described in the attached document "Unconsolidated Deposit Descriptive Requirements."
3. (Sec. 3.4.2) Decontamination of soil sampling equipment shall include a non-phosphate detergent wash while scrubbing with a stiff bristle brush in order to remove all visible traces of soil contamination, followed by an organic solvent (i.e. hexane) rinse, then triple rinsed with distilled water until no visible traces of detergent remain.
4. (Sec. 3.4.2) In order to verify the accuracy of the organic vapor detector, at least one soil sample rendering a zero detection reading shall be analyzed with laboratory techniques.
5. (Sec. 3.4.2) A more detailed Soil Sampling and Analysis Plan is required.
6. (Sec. 3.4.3) contains the statement, "The 0 to 6-inch depth interval of all six (6) soil borings will be tested...." However, Section 3.4.1 specifies that seventeen (17) soil borings will be taken. Therefore, the six (6) soil borings mentioned in Section 3.4.3 need to be identified.
7. (Sec. 3.4.3) Testing for total RCRA metals, VOC's and pH shall be performed on the 6 to 12-inch depth interval as well as the 0 to 6-inch depth interval of soil borings.
8. (Sec. 3.4.3) In addition to the soil test parameters listed in Comment #2, of this section, soil samples shall be tested for semi-volatile organic compounds (SVOC's).
9. (Sec 3.4.3) Soil boring locations that indicate contamination at the 30 to 36-inch depth interval shall also be sampled at six (6)-inch intervals down to the zone of saturation .
10. (Sec. 3.4.5) The location chosen for the background boring should come from an area not affected by the facility and consisting of native soils, not fill material.

11. (Sec. 3.5.1) The placement of the three (3) proposed downgradient monitoring wells is unacceptable, according to 329 IAC 3-20-2(a)(2): the system must include "Monitoring wells (at least three (3)) installed hydraulically downgradient, i.e., in the direction of decreasing static head at the limit of the waste management area." As proposed, these wells lie 200 to 300 feet away from Building 48. It is recommended that these wells be placed within fifty (50) feet (preferably thirty (30) feet) of the perimeter of Building 48.
12. (Sec. 3.5.1) The proposed placement of a monitoring well inside Building 48 is unacceptable. Installing a monitoring well at this location introduces the possibility of cross-contamination. According to 329 IAC 3-20-2(a)(2), monitoring wells are to be placed at the limit of the waste management area, not within the waste management area.
13. (Sec. 3.5.3) According to 329 IAC 3-20-3, a more detailed Ground Water Sampling and Analysis Plan is required. An example of what is expected in a Sampling and Analysis Plan is contained in the attached document entitled "Ground Water Sampling and Analysis Plan."
14. (Sec. 3.5.3) Upon Completion of the first year of ground water monitoring, the State reserves the right to order continued monitoring and corrective actions if necessary.
15. (Sec. 3.5.4) Ball Corporation must perform a 40 CFR 264 Appendix IX parameter scan of the ground water due to the large variety of wastes stored in building 48.
16. (Sec. 3.5.4) Not all analytes (organics) have specified regulatory levels in ground water. Ball Corporation needs to specify what actions will be taken when testing for parameters that have no specific regulatory level.
17. (Sec. 3.3.2) Chip samples should not be taken. In order to determine the completeness of decontamination, the final rinsate will be analyzed for the hazardous waste characteristics of pH, volatile and semi-volatile organics, and total heavy metals. The analytical results from the rinsate will be compared with the regulatory threshold for total metals to determine if any hazardous waste remains following decontamination. VOC's and SVOC's should be below detection limits to be considered clean.
18. (Sec. 3.4.1) The borings will be drilled down to the first aquifer. Samples will be taken every 6-inches for the first 2-feet and every 1-foot thereafter until the first aquifer is reached. All samples from all borings down to the 2-feet level will be analyzed for pH, EP-tox, corrosivity, VOC's and SVOC's. Additional analysis of

samples from greater depths will be determined by the results generated from the analysis of samples taken from the 0-2-foot level. Timeliness of analysis is critical due to the fourteen (14) days holding time for VOC's, and seven (7) day before extraction forty (40) days till analysis holding time for SVOC's.

19. A minimum of four (4) background borings will be required. Ball Corporation will propose the location of the four (4) background borings. Background samples will be taken at the same intervals, and analyzed for the same parameters as the samples taken from the other borings.
20. A copy of the laboratory's Quality Assurance Project Plan (QAPP) must be submitted for our approval.
21. Please address the following inconsistencies:
 - a. Pg. 11, Sec. 3.4 states that seventeen (17) soil borings will be drilled...etc., while Pg. 13, Sec. 3.4.3 states that the 0-6-inch depth interval of all six (6) soil borings will be tested...etc.
 - b. Pg. 8, Sec. 3.1 states that five (5) monitoring well clusters will be installed...etc., while Pg. 14, Sec. 3.5.1. states that five (5) monitoring wells will be installed.
 - c. Pg. 12, Sec. 3.4.2 states that as seventeen (17) samples are to be collected...etc., the actual number of samples will be close to two hundred (200) with approximately twenty (20) duplicates, if the background borings samples are included. Note, this discrepancy will substantially change the closure cost estimate, even though all the samples may need not be analyzed depending on the vertical and horizontal extent of contamination.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

FILE

RECEIVED
SEP 22 1989
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

VIA CERTIFIED MAIL - P730-167-589

September 19, 1989

Mr. Richard Cole, Jr.
Ball Corporation
P.O. Box 2729
Muncie, Indiana 47307-0729

Re: Request for Closure Extension
Ball Corp. Building 56
Muncie, Indiana
IND 000810713

Dear Mr. Cole:

On August 11, 1989, the Indiana Department of Environmental Management (IDEM) received your request for an extension of time to complete closure activities at building 56. The extension is required to propose modifications to the approved closure plan. The modifications will propose a more representative sampling and analysis plan.

You are hereby granted an additional one hundred-eighty (180) days to complete closure. All closure activities must be completed by February 9, 1990. You have an additional sixty (60) days after February 7, 1990, to submit certification of closure.

If you have any questions concerning this matter, please contact Mr. John P. Maher of the Plan Review and Permit Section at AC 317/232-4534.

Very truly yours,

Thomas E. Linson, Chief
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

JPM/dj

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V
Mr. James Hunt
Mr. Dennis Zawodni



FILE

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

November 29, 1988

Legal Advertising Department
Muncie Star
P.O. Box 2408
128 S High Street
Muncie, Indiana 47302

Re: Public Notice of Closure
Ball Corporation Building No. 56
IND 000810713

Dear Sir/Madam:

Enclosed is a copy of our public notice of closure for Ball Corporation, Building No. 56, Muncie, Indiana. Please publish this notice, one time, on December 5, 1988.

Please provide a notarized form and clippings showing the date of publication. All charges should be billed to the Department of Environmental Management, Office of Solid and Hazardous Waste Management. If a separate invoice is sent, be sure to include the publication date of the notice on the invoice.

Your timely attention to this matter is appreciated.

Very truly yours,

Thomas E. Linson, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

JS/rmw

Enclosure

cc: Ms. Nancy Maloley (with enclosure)
Mr. Wayne Penrod (with enclosure)
Ms. Catherine Lynch (with enclosure)
Mr. Thomas Russell (with enclosure)
Ms. Carmen Bryant (with enclosure)
Mr. Hak Cho, U.S. EPA, Region V
Mr. Bernie Orenstein, U.S. EPA, Region V
Mr. John Maher (with enclosure)

An Equal Opportunity Employer

FILE

Gus Bloom
PLEASE FILE
Thanks!



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NANCY A. MALOLEY, Commissioner

RECEIVED
FEB 10 1989

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

VIA CERTIFIED MAIL - P652-575-110

Mr. Richard H. Cole, Jr.
Chemical Information Specialist
Ball Corporation
P.O. Box 2407
Muncie, Indiana 47307-0407

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

February 7, 1989

Re: Modified Closure Plan
Ball Corporation Building 56
Muncie, Indiana
IND 000810713

Dear Mr. Cole:

The partial closure plan dated December 21, 1988, for Ball Corporation's container storage area has been approved with the following modifications:

1. A minimum of four (4) background samples will be taken in an area(s) that can reasonably be assumed to be uncontaminated by the facility's activities. Use the sampling methods described in section 2.3.2 of the approved plan for collecting background samples.
2. Since there was a concrete floor in Building 56, the soil sampling plan will be weighted to sample around the perimeter of the former pad location. Two (2) additional soil sampling points shall be located on the outside edge of the former pad. One (1) HA-9 shall be located at the midpoint of the south edge. HA-10 shall be at the midpoint of the north edge (see diagram).
3. If metal contamination is confirmed, the soil will be treated and/or removed until the parameters of concern are within two (2) standard deviations of the mean background levels.
4. Soil samples will be analyzed for all hazardous wastes and hazardous waste constituents believed to be stored in Building 56.

A public notice of the closure plan was published in the Muncie Star. The public comment period began on the date of publication, December 5, 1988, and ended on January 5, 1989. No comments were received.

Applicable closure activities must be completed in accordance with the approved plan within one hundred eighty (180) days after the date of this approval letter. When closure is completed, the owner or operator must submit to the Commissioner certification in accordance with 329 IAC 3-34-2(d) and 329 IAC 3-21-6. Certification should be by both the owner or operator and by an independent registered professional engineer, stating that the facility has been closed in accordance with the specifications in the approved closure

An Equal Opportunity Employer

Mr. Richard H. Cole, Jr.
Page 2

plan. The response must indicate the facility's desired future status. Mail a copy of your response and certification to:

Mr. Thomas E. Linson, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management
Department of Environmental Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015

In addition, Section 206 of the Hazardous and Solid Waste Amendments of 1984 (HSWA) requires that corrective actions be performed for all releases of hazardous waste or constituents from any solid waste management unit. The U.S. Environmental Protection Agency (U.S. EPA) has the authority to implement this provision, therefore, your company may still be subject to HSWA requirements.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a Petition for Administrative Review and a Petition for Stay of Effectiveness. These petitions must be submitted to the IDEM within fifteen (15) days of your receipt of this notice. The petitions must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision, or otherwise entitled to review by law. The petitions must specifically identify those portions or conditions of the modified closure plan for which a stay and/or administrative review is being requested.

Please direct all questions regarding the closure process to Mr. John P. Maher of my office at AC 317/232-4534.

Sincerely,

Bruce H. Palin

Bruce H. Palin
Acting Assistant Commissioner for
Solid and Hazardous Waste Management

JPM/jb
Enclosures

cc: Mr. Hak Cho, U.S. EPA, Region V (with enclosure)
Mr. Bernie Orenstein, U.S. EPA, Region V
Delaware County Health Department (with enclosure)
Mr. Jeff Stevens
Ms. Catherine Lynch
Mr. Dennis Zawodni (with enclosure)
Mr. Jim Hunt (with enclosure)

● BG-17

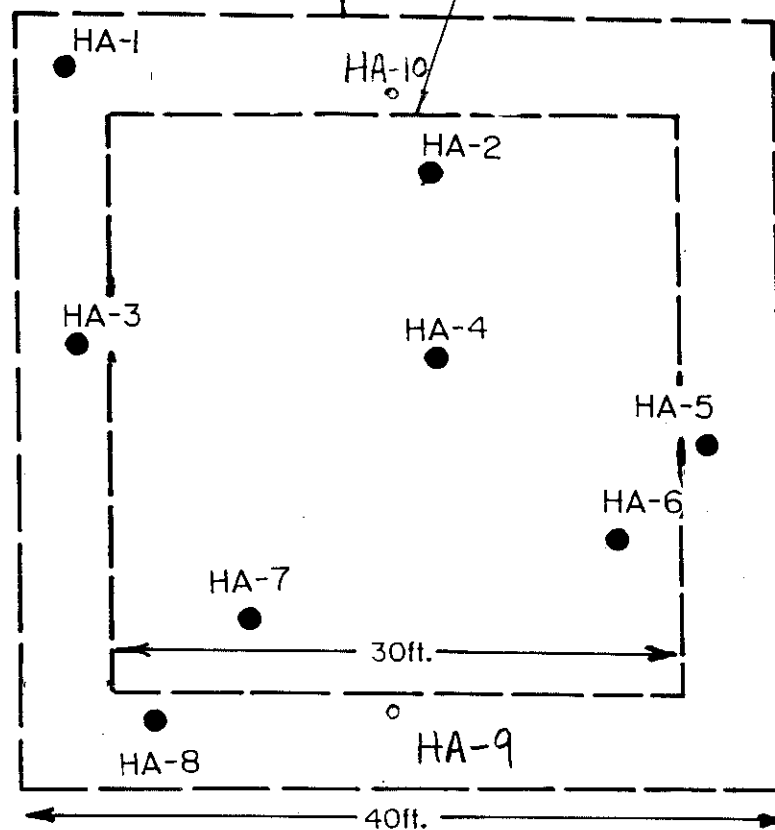
LEGEND

⊗ BG-1 ARBITRARILY LOCATED
BACKGROUND SAMPLE

● HA-1 ACTUAL SELECTED HAND
AUGER SAMPLE LOCATION
(RANDOMLY SELECTED)

PERIMETER OF MAXIMUM
CONTAMINATION (5ft. BEYOND
BUILDING PAD)

LOCATION OF FORMER PAD
BUILDING NO. 56



NOTE: GRID INTERVAL FOR CELL DETERMINED BY THE GRID INTERVAL EQUATION

SAMPLING PLAN
BALL CORPORATION
MUNCIE, IN

PROJECT NO.
21-77055

SCALE
1" = 10'

FIGURE NO.
3



● BG-17

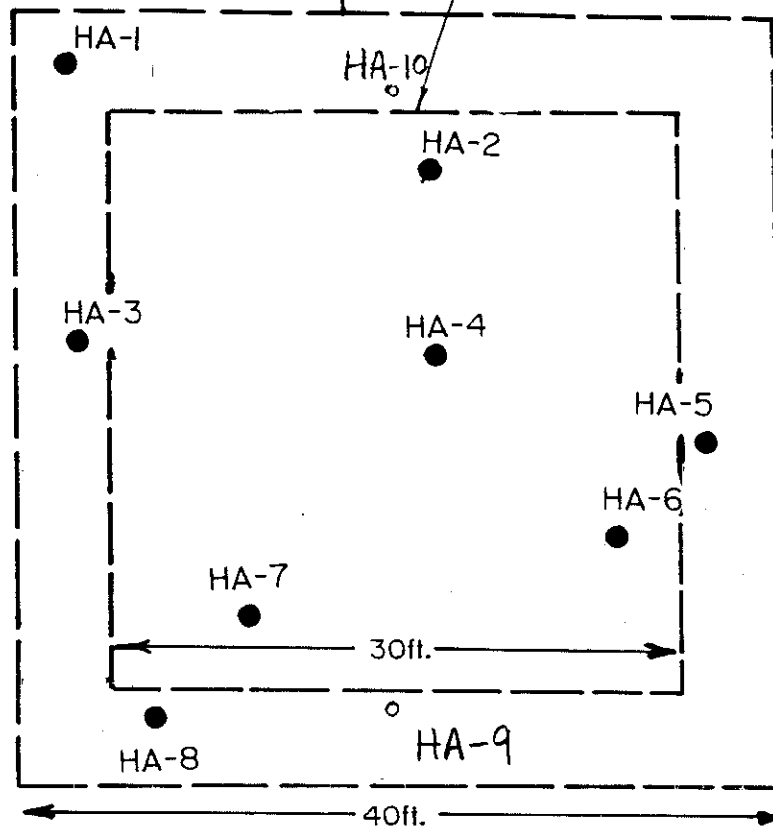
LEGEND

⊗ BG-1 ARBITRARILY LOCATED
BACKGROUND SAMPLE

● HA-1 ACTUAL SELECTED HAND
AUGER SAMPLE LOCATION
(RANDOMLY SELECTED)

PERIMETER OF MAXIMUM
CONTAMINATION (5ft. BEYOND
BUILDING PAD)

LOCATION OF FORMER PAD
BUILDING NO. 56



NOTE: GRID INTERVAL FOR CELL DETERMINED BY THE GRID INTERVAL EQUATION

SAMPLING PLAN
BALL CORPORATION
MUNCIE, IN

PROJECT NO.
21-77055

SCALE
1" = 10'

FIGURE NO.
3





FILE
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

Mr. Richard H. Cole Jr.
Chemical Information Specialist
Ball Corporation
P.O. Box 2407
Muncie, Indiana 47307-0407

November 28, 1988

Re: Completeness Notice of Deficiency
Closure Plan, Building 48
Ball Corporation
Muncie, Indiana
IND 000810713

Dear Mr. Cole:

Staff has performed a completeness review on the facility closure plan received October 25, 1988, and found it inadequate for approval. The enclosed "Closure Plan Deficiencies" identifies those areas which need to be addressed. Please submit five (5) copies of the revised closure plan within thirty (30) days of the date of this letter.

If you have any questions regarding this matter, please contact Mr. John P. Maher of the Plan Review and Permit Section at AC 317/232-4534.

Very truly yours,

Thomas L. Russell

Thomas L. Russell, Chief
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

JPM/rmw

Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region V
Mr. Bernie Orenstein, U.S. EPA Region V
Delaware County Health Department
ATEC Environmental Consultants
Mr. Dennis Zawodni
Mr. Steve Hunter

RECEIVED
NOV 30 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Closure Plan Deficiencies
Ball Corporation, Building 48
IND 000810713

1. Include information on how hazardous wastes are handled throughout the facility. Provide a brief description of any other TSDs at the facility. Locate and label all past and present TSDs on all maps and diagrams.
2. Provide a detailed description of building 48. Include age, materials of construction, description of secondary containment if any, location of sewers and floor drains, type and condition of floor, etc. Include any information on known release in or around building 48.
3. An attachment to the original Part A application, dated November 18, 1980, indicated building 5 (30 feet by 60 feet), adjacent to the south end of building 48, was used to store hazardous waste. Address and if necessary include the closure of building 5, with the closure plan of building 48.
4. Include in the closure plan a detailed description of the water main break and how it affected the container storage unit. Describe all possible contamination pathways resulting from this incident.
5. A letter from Mr. Jeffery A. Wineinger to the Indiana Department of Environmental Management (IDEM) dated August 3, 1988, states that water entered and exited building 48 through cracks in the floor and around support beams. Locate the cracks and seams on figure 3 and modify the soil sampling plan to include soils under these pathways.
6. Describe the floor drain system for building 48. Include the type of pipes, joints, condition, etc. State that soil samples will be taken at the floor drains. Explain how the sampling will continue along the drain pipes if contamination is confirmed.
7. How will the rinsate from the pad decontamination be contained and collected? State that the cracks and seams will be temporarily sealed during decontamination to prevent the loss of rinsate.
8. State what actions will be taken if the chip samples reveal contamination after the pressure steam wash is complete.
9. Provide justification for the location and size of the proposed soil sampling areas.
10. State how the pad and soil sampling areas will be expanded if contamination is found on the border(s) of the proposed areas.
11. Justify the choice of pad, soil, and ground water sampling parameters that are listed in sections 2.3.2, 2.4.3, and 2.5.4.

12. Change the heavy metal analysis method for chip, soil, and ground water samples from EP toxicity to total metals. Total metals is the more appropriate method for determining the presence of contaminants.
13. State what Chain of Custody and QA/QC procedures will be utilized for all sampling and analysis.
14. State what cleanup standards will be used if contamination is found. The cleanup standard for VOCs shall be the detection limits since VOCs are not naturally occurring in soil. The cleanup standard for metals should be clean water standards or within two (2) standard deviations of background samples.
15. In order to evaluate the appropriateness of background sample and monitoring well locations, include a map or diagram showing all areas of releases including areas where mineral spirits were disposed of and where soil was contaminated with fuel oil and gasoline.
16. Document the direction of ground water flow and justify the monitoring well locations.
17. Discuss the future use of building 48.
18. Provide a north arrow on figure 3.
19. Include in the closure cost estimate the cost of inventory removal and equipment decontamination.
20. Attachment 1 appears to be a list of the entire building inventory including hazardous and nonhazardous wastes. Provide a list of hazardous wastes only and include the quantities and appropriate waste codes.
21. Provide documentation of your financial assurance for closure as required by 329 IAC 3-22-4. Section 5.0 states that a financial assurance statement is provided in Appendix B. Appendix B was not included in the closure plan.
22. Provide documentation of your liability coverage for sudden accidental occurrences as required by 329 IAC 3-22-24(a).
23. Include your EPA I.D. number in all documents and correspondence concerning hazardous waste activity.



FILE

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

RECEIVED
NOV 23 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Hak Cho
Gony

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

November 21, 1988

Mr. Richard H. Cole Jr.
Chemical Information Specialist
Ball Corporation
P.O. Box 2407
Muncie, Indiana 47307-0407

Re: Completeness Notice of Deficiency
Closure Plan, Building 56
Ball Corporation
Muncie, Indiana
IND 000810713

Dear Mr. Cole:

Staff has performed a completeness review of the facility closure plan received October 25, 1988, and found it inadequate for approval. The enclosed "Closure Plan Deficiencies," identifies those areas which need to be addressed. Please submit a revised closure plan within thirty (30) days of the date of this letter.

If you have any questions regarding this matter, please contact Mr. John P. Maher of the Plan Review and Permit Section at AC 317/232-4534.

Very truly yours,

Thomas L. Russell

Thomas L. Russell, Chief
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

JPM/drc

Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region V
Mr. Bernie Orenstein, U.S. EPA, Region V
Delaware County Health Department
Atec Environmental Consultants
Mr. Bruce Kizer, IDEM
Mr. Dennis Zawodni, IDEM

CLOSURE PLAN DEFICIENCIES
Ball Corporation
Muncie, Indiana
IND 000810713

1. Provide a brief description of the remaining hazardous waste storage area including its location within the facility. Include information of how hazardous wastes are handled throughout the facility.
2. Provide a detailed description of building 56. Include age, materials of construction, description of secondary containment if any, date razed, type and condition of floor, etc. Is there any record of releases in or around building 56?
3. Indicate how the building materials were disposed of after demolition. Was it decontaminated? Provide documentation.
4. The formula used to determine soil sampling grid intervals is unacceptable for areas under three acres. For smaller areas the following formula should be used.

$$GI = (A/\pi)^{0.5/2}$$

GI = grid interval

A = area

For a 1,600 square-foot area the GI would be 4.75 feet.

5. State that the number of sampling locations chosen will provide a statistically valid approximation of the parameter concentrations throughout the gridded area. Provide justification.
6. State how the sampling program will be expanded both horizontally and vertically if contamination is found at the currently proposed borders.
7. Justify the number and location of background samples. Provide a map or diagram showing the background sample locations.
8. Justify the soil analysis parameters that were listed in Section 2.3.3.
9. State what cleanup standards will be used if contamination is found. The cleanup standard for VOC's shall be detection limits since VOC's are not naturally occurring in soil. The cleanup standard for metals should be clean water standards or within two (2) standard deviations of background samples.
10. Change the heavy metal analysis methods for metals in table 2 and the related text from EP-toxicity to total metals. Total metals is the more appropriate method for determining the presence of contaminants.

11. State what chain of custody and QA/QC procedures will be utilized.
12. Outline what actions will be taken if contamination is found.
Section 2.4 does not address contaminant levels between one (1) and two (2) time background concentrations.
13. The closure cost estimate included cost for soil removal to a depth of two (2) feet. Based on this assumption soil analysis cost need to be adjusted to include analysis at six (6) inch intervals to a depth of 2.5 feet for each sample location. Analysis costs also need to be adjusted to reflect the new grid interval.
14. Provide documentation of your financial assurance for closure as required by 329 IAC 3-22-4. Page 12 states that a financial assurance statement is included as Appendix A. However, no appendix A was included in the closure plan.
15. Provide documentation of your Liability coverage for sudden accidental occurrences as required by 329 IAC 3-22-24(a).
16. Include your EPA I.D. number in all documents and correspondence concerning hazardous waste activity.

JUN 13 1984

SHW-12

Edward J. Moran, Director
Ball Corporation
345 South High Street
Muncie, Indiana 47302

RE: Financial Liability Requirements
Certificate of Insurance
IND0000810713

Dear Mr. Moran:

The United States Environmental Protection Agency has received your certificate of Insurance, dated May 3, 1984, in response to the Resource Conservation and Recovery Act, financial responsibility requirements.

Your submission does not satisfy the specified requirements outlined in the 40 CFR 6265.147 regulations.

The owner or operator must have and maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million. The policy must be amended by attachment of the Hazardous Waste Facility Liability Endorsement or evidenced by a certificate of Liability Insurance. Also, the wording of the endorsement must be identical to the wording specified in the Indiana Administrative code (IAC) 320 IAC 4-7-26.

Please submit the amended information to the Indiana State Board of Health (ISBH), Division of Land Pollution Control at 1330 West Michigan, Indianapolis, Indiana 46206 or contact Mr. Jeff Stevens, at (317) 633-0770 to answer any questions.

Failure to amend your financial assurance filing to conform with State regulations may subject your company to enforcement action. Please forward the corrected documents to Mr. Stevens within 30 days of this letter.

Sincerely,

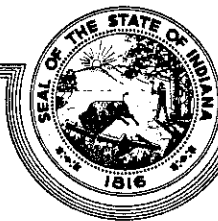
Hak K. Cho, Chief
State Technical Unit #4

Enclosure

cc: Jeff Stevens, Hearing Officer, ISBH

SHW/Smith	INITIALS	TYRIST	AUTHOR	STU #1	STU #2	STU #3	TPS	WMB	WMD
SHW/Smith	DATE	6/12/84	6/12/84	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	DIRECTOR
		6/12/84	6/12/84	6/12/84					

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

August 8, 1985

VIA CERTIFIED MAIL

Mr. Charles E. Wilson
Ball Corporation
345 South High Street
Muncie, IN 47302

Dear Mr. Wilson:

Re: Ball Corporation
1985 RCRA Financial Assurance
IND 000810713

Our records indicate that the facility indicated above is not in compliance with the Indiana RCRA financial assurance rules for the following reasons:

No current 1985 update of your financial test filing.

No special report from the independent Certified Public Accountant.

All insurance certificates must have original signature. Your submissions have either a rubber stamp signature or a xerox copy. I am enclosing a copy of the Indiana Hazardous Waste Financial Assurance Rules.

Failure to respond to this notice by September 9, 1985, will result in the referral of this matter to the Enforcement Section. If you have any questions regarding this, please contact Ms. Susan Hyndman, C.P.A., of this office at AC 317/243-5140.

Very truly yours,

Jeffrey W. Stevens
Environmental Hearing Officer
Division of Land Pollution Control

JWS/sk
Enclosure
cc: Ms. Sally Swanson, Region V, U.S. EPA

IND 000810713



Ball Corporation

345 South High Street, Muncie, Indiana 47302 (317) 747-6100

May 19, 1983

United States Environmental Protection Agency
Regional Administrator
230 S. Dearborn
Chicago, IL 60604

RE: EXCESS LIABILITY

Enclosed is a certificate of insurance indicating renewal of our excess liability for the period 4/1/83 - 4/1/84. If you have any questions, please contact us.

Donna A. Holsinger

Donna A. Holsinger
Corporate Risk Dept.

Enclosure

RECEIVED
MAY 24 1983
WASTE MANAGEMENT
BRANCH

Certificate of Insurance



THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.
THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

NAME AND ADDRESS OF AGENCY

Corroon & Black of Illinois, Inc.
135 S. La Salle Street
Chicago, Illinois 60603

COMPANIES AFFORDING COVERAGES

COMPANY LETTER **A** New England Reinsurance Corporation

COMPANY LETTER **B**

COMPANY LETTER **C**

COMPANY LETTER **D**

COMPANY LETTER **E**

NAME AND ADDRESS OF INSURED

Ball Corporation
345 South High Street
Muncie, Indiana 47302

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

COMPANY LETTER	TYPE OF INSURANCE	POLICY NUMBER	POLICY EXPIRATION DATE	Limits of Liability in Thousands (000)		
					EACH OCCURRENCE	AGGREGATE
	GENERAL LIABILITY <input type="checkbox"/> COMPREHENSIVE FORM <input type="checkbox"/> PREMISES—OPERATIONS <input type="checkbox"/> EXPLOSION AND COLLAPSE HAZARD <input type="checkbox"/> UNDERGROUND HAZARD <input type="checkbox"/> PRODUCTS/COMPLETED OPERATIONS HAZARD <input type="checkbox"/> CONTRACTUAL INSURANCE <input type="checkbox"/> BROAD FORM PROPERTY DAMAGE <input type="checkbox"/> INDEPENDENT CONTRACTORS <input type="checkbox"/> PERSONAL INJURY			BODILY INJURY PROPERTY DAMAGE	\$ \$	\$ \$
				BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	\$
				PERSONAL INJURY		\$
	AUTOMOBILE LIABILITY <input type="checkbox"/> COMPREHENSIVE FORM <input type="checkbox"/> OWNED <input type="checkbox"/> HIRED <input type="checkbox"/> NON-OWNED			BODILY INJURY (EACH PERSON) BODILY INJURY (EACH ACCIDENT) PROPERTY DAMAGE BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$ \$ \$ \$	
A	EXCESS LIABILITY <input checked="" type="checkbox"/> UMBRELLA FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM	688253	4-1-86	BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$ 1,000	\$ 1,000
	WORKERS' COMPENSATION and EMPLOYERS' LIABILITY			STATUTORY		
	OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES

Description: This policy provides limits of liability of at least \$1,000,000 each occurrence, \$1,000,000 annual aggregate in excess of underlying primary insurance limits of \$1,000,000 each occurrence, \$1,000,000 annual aggregate

Cancellation: Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 60 days written notice to the below named certificate holder, but failure to mail such notice shall impose no obligation or liability of any kind upon the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER:

United States Environmental Protection
Agency - Regional Administrator
230 S. Dearborn
Chicago, Illinois 60604

DATE ISSUED: 5-10-83

John T. Kelly
AUTHORIZED REPRESENTATIVE

IND 000 810713

ACORD

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.
THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

NAME AND ADDRESS OF AGENCY

Morrison-Gallagher, Inc.
324 West Jackson St.
Muncie, IN 47305

COMPANIES AFFORDING COVERAGES

COMPANY LETTER **A** American Employers Insurance Co.

COMPANY LETTER **B**

COMPANY LETTER **C**

COMPANY LETTER **D**

COMPANY LETTER **E**

NAME AND ADDRESS OF INSURED

Ball Corporation
345 South High Street
Muncie, IN 47302

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

COMPANY LETTER	TYPE OF INSURANCE	POLICY NUMBER	POLICY EXPIRATION DATE	LIMITS OF LIABILITY IN THOUSANDS (000)		
					EACH OCCURRENCE	AGGREGATE
A	GENERAL LIABILITY	CLAI9101-165	4/1/85	BODILY INJURY	\$ 1,000	1,000
	<input checked="" type="checkbox"/> COMPREHENSIVE FORM			PROPERTY DAMAGE	\$ 1,000	1,000
	<input checked="" type="checkbox"/> PREMISES—OPERATIONS					
	<input checked="" type="checkbox"/> EXPLOSION AND COLLAPSE HAZARD					
	<input checked="" type="checkbox"/> UNDERGROUND HAZARD					
	<input checked="" type="checkbox"/> PRODUCTS/COMPLETED OPERATIONS HAZARD					
	<input checked="" type="checkbox"/> CONTRACTUAL INSURANCE					
	<input checked="" type="checkbox"/> BROAD FORM PROPERTY DAMAGE					
	<input checked="" type="checkbox"/> INDEP. CONTRACTORS					
	<input checked="" type="checkbox"/> PERSONAL INJURY					
AUTOMOBILE LIABILITY						
<input type="checkbox"/> COMPREHENSIVE FORM						
<input type="checkbox"/> OWNED						
<input type="checkbox"/> HIRED						
<input type="checkbox"/> NON-OWNED						
EXCESS LIABILITY						
<input type="checkbox"/> UMBRELLA FORM						
<input type="checkbox"/> OTHER THAN UMBRELLA FORM						
WORKERS' COMPENSATION and EMPLOYERS' LIABILITY						
OTHER						

RECEIVED

JUL 16 1984

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES

See attached

RECEIVED

JUL 16 1984

Cancellation: Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 60 days written notice to the below named certificate holder, but failure to mail such notice shall impose no obligation or liability of any kind upon the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER

U.S. Environmental Protection Agency
Regional Administrator
230 South Dearborn
Chicago, IL 60604

DATE ISSUED

5/3/84 dm

Morrison-Gallagher, Inc.


By

AUTHORIZED REPRESENTATIVE

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. American Employers Insurance Company (the "Insurer"), of Boston, Massachusetts hereby certifies that it has issued liability insurance covering bodily injury and property damage to Ball Corporation, (the "insured"), of 345 South High Street, Muncie, Indiana, 47302, in connection with the insured's obligation to demonstrate financial responsibility under 320 IAC 4-7-26. The coverage applies at IND 000 810713, Ball Corporation, 1509 South Macedonia Avenue, Muncie, Indiana for "sudden accidental occurrences," "nonsudden accidental occurrences," or "sudden and nonsudden accidental occurrences. The limits of liability are \$1,000,000 each occurrence and \$1,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number CLAI-9101-165 issued on April 1, 1984.
2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
 - a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 320 IAC 4-7-26 (f).
 - c) Whenever requested by the technical secretary of the Environmental Management Board of the State of Indiana (EMB), the Insurer agrees to furnish to the technical secretary a signed duplicate original of the policy and all endorsements.
 - d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the technical secretary of the EMB.
 - e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the technical secretary.

I hereby certify that the wording of this instrument is identical to the wording specified in 320 IAC 4-7-36 as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.


M. J. Cavanaugh
Special Risk Manager
American Employers' Insurance Company
230 East Ohio Street
Indianapolis, Indiana 46244

JUN 18 1984

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-12

JUN 13 1984

Edward J. Moran, Director
Ball Corporation
345 South High Street
Muncie, Indiana 47302

RE: Financial Liability Requirements
Certificate of Insurance
IND000810713

Dear Mr. Moran:

The United States Environmental Protection Agency has received your certificate of Insurance, dated May 3, 1984, in response to the Resource Conservation and Recovery Act, financial responsibility requirements.

Your submission does not satisfy the specified requirements outlined in the 40 CFR §265.147 regulations.

The owner or operator must have and maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million. The policy must be amended by attachment of the Hazardous Waste Facility Liability Endorsement or evidenced by a certificate of Liability Insurance. Also, the wording of the endorsement must be identical to the wording specified in the Indiana Administrative code (IAC) 320 IAC 4-7-26.

Please submit the amended information to the Indiana State Board of Health (ISBH), Division of Land Pollution Control at 1330 West Michigan, Indianapolis, Indiana 46206 or contact Mr. Jeff Stevens, at (317) 633-0770 to answer any questions.

Failure to amend your financial assurance filing to conform with State regulations may subject your company to enforcement action. Please forward the corrected documents to Mr. Stevens within 30 days of this letter.

Sincerely,


Hak K. Cho, Chief
State Technical Unit #4

Enclosure

cc: Jeff Stevens, Hearing Officer, ISBH



Ball Corporation

345 South High Street, Muncie, Indiana 47302 (317) 747-6100

April 1, 1983

ND 000810713
RECEIVED
APR 07 1983
**WASTE MANAGEMENT
BRANCH**

TO: CERTIFICATE HOLDERS

Enclosed is a Certificate of Insurance indicating renewal of our Comprehensive General Liability coverage for the period April 1, 1983 through April 1, 1984.

Edward J. Moran
Director
Corporate Risk

Enclosure

Certificate of Insurance



THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.
THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

NAME AND ADDRESS OF AGENCY Morrison-Gallagher, Inc. 224 West Jackson St. Muncie, IN 47305	COMPANIES AFFORDING COVERAGES	
	COMPANY LETTER	A American Employers Ins. Co.
	COMPANY LETTER	B
	COMPANY LETTER	C
	COMPANY LETTER	D
NAME AND ADDRESS OF INSURED Ball Corporation 345 South High Street Muncie, IN 47302	COMPANY LETTER	E

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

COMPANY LETTER	TYPE OF INSURANCE	POLICY NUMBER	POLICY EXPIRATION DATE	Limits of Liability in Thousands (000)		
					EACH OCCURRENCE	AGGREGATE
A	GENERAL LIABILITY	CLA19101-152	4/1/84	BODILY INJURY	\$ 1,000	\$ 1,000
	PROPERTY DAMAGE			\$ 1,000	\$ 1,000	
	BODILY INJURY AND PROPERTY DAMAGE COMBINED			\$	\$	
	PERSONAL INJURY				\$ 1,000	
	AUTOMOBILE LIABILITY					
	<input type="checkbox"/> COMPREHENSIVE FORM					
	<input type="checkbox"/> OWNED					
	<input type="checkbox"/> HIRED					
<input type="checkbox"/> NON-OWNED						
	EXCESS LIABILITY					
	<input type="checkbox"/> UMBRELLA FORM					
	<input type="checkbox"/> OTHER THAN UMBRELLA FORM					
	WORKERS' COMPENSATION and EMPLOYERS' LIABILITY					
	OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES

See attached

Cancellation: Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 60 days written notice to the below named certificate holder, but failure to mail such notice shall impose no obligation or liability of any kind upon the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER:

U.S. Environmental Protection Agency
 Regional Administrator
 230 South Dearborn
 Chicago, IL 60604

DATE ISSUED: 4/1/83 bm

Morrison-Gallagher, Inc.

By:

AUTHORIZED REPRESENTATIVE

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. American Employers Insurance Company (the "Insurer"), of Boston, Massachusetts hereby certifies that it has issued liability insurance covering bodily injury and property damage to Ball Corporation, (the "insured"), of 345 South High Street, Muncie, Indiana, 47302, in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at IND 000 810713, Ball Corporation, 1509 South Macedonia Avenue, Muncie, Indiana for "sudden accidental occurrences," "nonsudden accidental occurrences," or "sudden and nonsudden accidental occurrences." The limits of liability are \$1,000,000 each occurrence and \$1,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number CLAI-9101-149, issued on April 1, 1982.
2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
 - a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 or 265.147.
 - c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.
 - e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility is located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 as such regulation was constituted

on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.



P. W. Down

Morrison, Galliher, Inc.
American Employers Insurance Company
324 West Jackson Street
Muncie, Indiana 47305